## REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-4, 6-14, 16-21, and 23-35 are currently pending. Claims 1, 11, 19, 25, and 26; and Claims 32-35 have been added by the present amendment. The changes and additions to the claims are supported by the originally filed specification and do not add new matter.[1]

In the outstanding Office Action, Claim 1 was rejected under 35 U.S.C. § 112, second paragraph, regarding the recited "image generating means"; Claims 1, 2, 4, 10, 11, 14, 19, 21, and 25-31 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,902,513 to McClure (hereinafter "the '513 patent"); and Claims 1, 3, 6-9, 11-13, 16-20, 23, and 24 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,353,137 to Vock et al. (hereinafter "the '137 patent").

## STATEMENT OF SUBSTANCE OF INTERVIEW

Applicants wish to thank Examiners Rajan and Astorino for the interview granted Applicants' representative on May 12, 2009, at which time the outstanding rejections under 35 U.S.C. § 112, second paragraph, and 35 U.S.C. § 102(e) were discussed. Further, proposed amendments to further distinguish the claims over the applied references were discussed. The Examiners indicated that the claims would be reconsidered upon formal submission of a response to the Office Action.

## REJECTION UNDER 35 U.S.C. § 112

[1] See, *e.g.*, page 12, lines 5-11 and page 18, line 15 to page 21, line 16 of Applicants' specification.

The Office Action rejects Claim 1 under 35 U.S.C. § 112, second paragraph, indicating that it is unclear whether the recited "image generating means" comprises hardware, or merely software.[2] In response to the Office Action's request that Applicants point out the structure corresponding to the recited "image generating means," for a non-limiting example, it is noted that the specification, at least at page 15, lines 8-10, discloses that "the CPU 29 estimates an emotion, sensation and motion of a person, and then generates images corresponding to the condition of the person." Accordingly, it is respectfully requested that the rejection of Claim 1 under 35 U.S.C. § 112, second paragraph, be withdrawn.

REJECTION UNDER 35 U.S.C. § 102

Previously presented Claim 1 is directed to an image displaying system, comprising:

> a plurality of bio-information acquiring devices including
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> means for measuring bio-information on each of a plurality of persons under measurement, and
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> means for transmitting the bio-information; and
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> an image display device including
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> receiving means for receiving the bio-information on the plurality of persons under measurement, transmitted from each of the plurality of bio-information acquiring devices,
>
> *image generating means for generating an image including objects that interact with each other on the basis of relationships among the bio-information on the plurality of persons under measurement received by the receiving means*, and
>
> display means for displaying the image,
>
> wherein the plurality of bio-information acquiring devices and the image display device are located in different places and connected to each other via a network.

[2] See Office Action dated February 19, 2009, page 2.

Regarding the rejection of Claim 1 under 35 U.S.C. § 102(e), as being anticipated by the '513 patent, the '513 patent is directed to interactive fitness equipment, which enhance a sense of competitiveness to promote more intense exercise. In particular, the Office Action cites the '513 display of different runners in relation to each other for teaching the claimed "image generating means."[3]

However, it is respectfully submitted that the '513 patent fails to disclose image generating means for generating an image including **objects that interact with each other on the basis of relationships among the bio-information on the plurality of persons** under measurement received by the receiving means. Rather, the '513 patent simply discusses that each treadmill 12 and 14 is preferably configured to have a display 13 and 15, respectively, which can provide a visual display to a user of the user's own performance, as well as certain comparative performance information pertaining to a user of a remote treadmill.[4] As noted in the Office Action, the '513 patent discusses that a separation distance between a person on treadmill 12 and a person on treadmill 14 may be incorporated into the visual display 13.[5] The '513 patent discusses that the separation distance may be determined based on a **difference in speed of the treadmills 12 and 14**.[6] That is, the '513 patent discusses displaying information such as a separation distance that is based on information of the treadmills 12 and 14. The '513 patent does not disclose displaying an image including ***objects that interact with each other based on relationships among bio-information*** on the person on treadmill 12 and the person on treadmill 14.

Thus, the '513 patent does not disclose the image generating means defined in Claim 1. Accordingly, Applicants respectfully traverse the rejection of Claim 1 (and all associated dependent claims) as being anticipated by the '513 patent.

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[3] See Office Action dated February 19, 2009, page 3.
[4] See '513 patent, column 9, lines 23-27.
[5] Id. column 10, lines 8-12.
[6] Id. at column 10, 2-11.

Regarding the rejection of Claim 1 under 35 U.S.C. § 102(e), as being anticipated by the '137 patent, the '137 patent is directed to sensing and reporting events associated with movement, environmental factors such as temperature, health functions, fitness effects, and changing conditions. In particular, the Office Action cites the plurality of MMDs 150 attached to a person "A" and a person "B," engaged in karate training for teaching the claimed "image generating means."[7]

However, it is respectfully submitted that the '137 patent fails to disclose image generating means for generating an image including objects that interact with each other on the basis of **relationships among the bio-information on the plurality of persons** under measurement received by the receiving means. Rather, the '137 patent simply discusses that data plots 154, 156, which show exemplary data from MMDs 150 attached to persons A, B, may be relayed to the Internet or television 170 to display impact speed and intensity for blows **given or received by persons A, B, and in real time**, to enhance the pleasure and understanding of the viewing audience.[8] Further, the '137 patent discusses that a representative display on a television 157 is illustrated in Fig. 8B, in which bar graphs 161 preferably indicate magnitude of an impact shown by event data 159 (e.g., when data 154, 156 indicates an impact exceeding 50 g's) by peak bar graph element 161a on TV 157.[9] The '137 patent does not disclose displaying an image including ***objects that interact with each other on the basis of relationships among*** the data 154 and 156.

Thus, the '137 patent does not disclose the image generating means defined in Claim 1. Accordingly, Applicants respectfully traverse the rejection of Claim 1 (and all associated dependent claims) as being anticipated by the '137 patent.

Claim 11 recites, in part,

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[7] See Office Action dated February 19, 2009, page 9.
[8] See '137patent, column 24, lines 50-56; and column 24, line 65 to column 25, line 3.
[9] Id. at column 25, lines 15-27.

> image generating means for generating an image including objects that interact with each other on the basis of relationships among the bio-information on the plurality of persons under measurement received by the bio-information receiving means.

Claim 19 recites, in part,

> generating an image including objects that interact with each other on the basis of relationships among the bio-information of the plurality of persons under management received in the receiving.

As noted above, the '513 and '137 patents fail to disclose the image generating means recited in Claim 1. Thus, the '513 and '137 patents fail to disclose image generating means and generating an image, as recited in Claims 11 and 19, respectively. Accordingly, Applicants respectfully traverse the rejections of Claims 11 and 19 (and all associated dependent claims) as being anticipated by each of the '513 and '137 patents.

Claims 25 and 26 recite limitations analogous to the limitations recited in Claims 1 and 11, respectively, but in non-means-plus-function format. Accordingly, for reasons analogous to the reasons stated above for the patentability of Claims 1 and 11, Applicants respectfully traverse the rejections of Claims 25 and 26 as being anticipated by each of the '513 and '137 patents.

## CONCLUSION

The present amendment also sets forth new Claims 32-35 for examination on the merits. No new matter has been added. It is respectfully submitted that these more detailed features are not disclosed or suggested by the applied references.

Thus, it is respectfully submitted that independent Claims 1, 11, 19, 25, and 26 (and all associated dependent claims) patentably define over the '513 and '137 patents.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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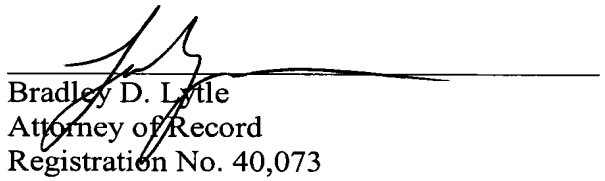

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